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July 10, 2023

Honorable Michael A. Shipp
 United States District Court
 District of New Jersey
 Clarkson S. Fisher Building & U.S. Courthouse
 402 East State Street
 Trenton, NJ 08608

**Re: Official Committee of Talc Claimants, Appellant
 v. LTL Management, LLC, Appellee
 Case No. 3:23-cv-02918**

Dear Judge Shipp:

Pursuant to Rule 6(b)(1) of the Federal Rules of Civil Procedure and Local Rule 6.1, Petitioner-Appellant, the Official Committee of Talc Claimants ("TCC") requests a modification of the briefing schedule in this appeal. All who have appeared in this appeal have consented to this request. Specifically, the TCC requests a 30-day extension of time in which to file its opening brief, with a corresponding adjustment of the schedule as proposed below:

<u>Filing</u>	<u>Current Deadline¹</u>	<u>Proposed New Deadline</u>
Appellant's Opening Brief	July 12, 2023	August 11, 2023
Appellee's Response Brief	August 11, 2023	September 11, 2023
Appellant's Reply Brief	August 24, 2023	September 25, 2023

¹ Pursuant to Federal Rule of Bankruptcy Procedure 8018(a)(1), the "appellant must serve and file a brief within 30 days after the docketing of notice that the record has been transmitted," which was docketed on June 12, 2023 (ECF No. 2). "The appellee must serve and file a brief within 30 days after service of the appellant's brief." Fed. R. Bankr. P. 8018(a)(2). "The appellant may serve and file a reply brief within 14 days after service of the appellee's brief," Fed. R. Bankr. P. 8018(a)(3).



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Good cause supports this request because postponing the parties' briefs in this appeal would conserve the parties' and this Court's resources. This appeal concerns the bankruptcy court's appointment of Randi Ellis as the future claimants' representative (Dkt. No. 551). However, currently pending before the bankruptcy court are several motions to dismiss the entire bankruptcy for cause pursuant to 11 U.S.C. § 1112(b)(1)—including motions by the TCC, several states, and the U.S. Trustee. (Dkt Nos. 286, 335, 346, 350, 358, 379, 384). The bankruptcy court has indicated that it plans to issue a ruling on the pending motions to dismiss on or before August 2, 2023. Dkt. No. 782 (06-13-23 Hr. Tr.) at 144:7–19. In the event that the bankruptcy court dismisses the bankruptcy in its entirety, it would moot this appeal because Ms. Ellis would no longer be serving as the future claimants' representative.

For these reasons, we respectfully request that the Court modify the briefing schedule as proposed herein.

Very truly yours,

GENOVA BURNS LLC

A handwritten signature in blue ink, appearing to read "DMS".

DANIEL M. STOLZ

DMS/lld

cc: Daniel B. Prieto, Esq. (dbprieto@jonesday.com)
cc: David Molton, Esq. (dmolton@brownrudnick.com)
cc: Steven Falanga, Esq. (sfalanga@walshlaw.com)
cc: Bret Vallacher, Esq. (bvallacher@masseygail.com)

So Ordered this 11th day of July, 2023

A handwritten signature in black ink, appearing to read "M Shipp".

Honorable Michael A. Shipp, U.S.D.J.